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August 30, 2018

VIA ECF

Hon. Roanne L. Mann
Chief Magistrate Judge
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Lelchook, et al. v. Islamic Republic of Iran, et al., 1:16-cv-07078-ILG-RLM

Dear Judge Mann:

This Firm has represented defendant Bank Saderat PLC ("BSPLC") in the above case.

Attached is defense counsel's affidavit complying with the Court's Memorandum Order of August 23, 2018.

Also attached is another copy of defense counsel's proposed order granting its Motion to Withdraw (filed 8-10-18) in the form originally attached to the Motion with one modification requested by plaintiffs' counsel. Plaintiffs' counsel does not object to the entry of the order.

Thank you for your attention to this matter.

Respectfully submitted,



Jeremy D. Frey (admitted *pro hac vice*)

cc: All counsel of record via ECF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ESTER LELCHOOK, et al.,

:

:

Plaintiffs,

:

Civil Action No.

:

16-CV-07078 (ILG)(RLM)

v.

:

:

ISLAMIC REPUBLIC OF IRAN, et al.,

:

Affidavit in Support of Motion to Withdraw

:

Defendants.

:

COMMONWEALTH OF PENNSYLVANIA)

)

ss:

COUNTY OF PHILADELPHIA)

)

JEREMY D. FREY, being duly sworn, deposes and says as follows:

1. This Affidavit is made in support of the Motion to Withdraw of Pepper Hamilton LLP in the above case of August 10, 2018, and pursuant to the Court's Memorandum Order of August 23, 2018 (DE 145) ("Memorandum Order").

2. I am a partner of the law firm of Pepper Hamilton LLP in Philadelphia, Pennsylvania, and one of the attorneys of record appearing on behalf of defendant Bank Saderat PLC ("BSPLC") in the above case.

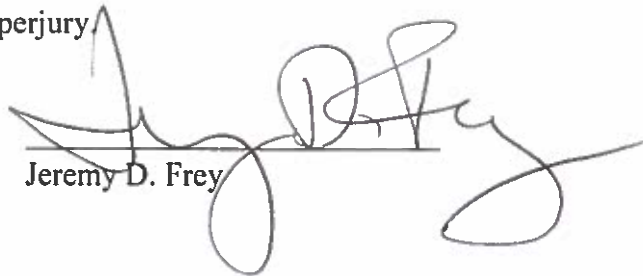
3. The current mailing address of BSPLC and Dr. Hamid Borhani, its Managing Director, is 5 Lothbury, London, UK EC2R 7HD. Dr. Borhani's current email address is borhani@saderat-plc.com.

4. On August 16, 2018, I transmitted by email to Dr. Borhani and Chris Wakefield, Assistant Managing Director of BSPLC, a copy of the Court's Minute Entry of August 10, 2018, and informed them in that email that a default judgment of the Court establishing plaintiffs' claims against BSPLC in this case is an obvious consequence of the decision to no longer defend the lawsuit.

5. On August 30, 2018, I transmitted by email to Dr. Borhani and Mr. Wakefield copies of the Court's Minute Entry of August 22, 2013 and the Memorandum Order.

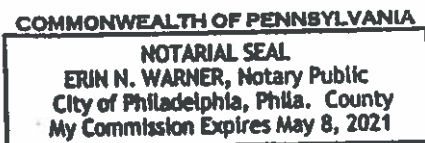
6. By these means I transmitted the Court's warnings about the entry of a default judgment against an unrepresented entity to BSPLC through Dr. Borhani as indicated.

I swear and affirm that the statements made in this affidavit are true and correct to the best of my personal knowledge, information, and/or belief. I understand that false statements herein are made subject to the penalties of perjury.


Jeremy D. Frey

Sworn to before me this 30th day of August, 2018


Notary Public



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ESTER LELCHOOK, et al.,

Docket No.
16-cv-7078 (ILG) (RLM)

Plaintiffs,

-against-

THE ISLAMIC REPUBLIC OF IRAN, et al.,

Defendants.
-----X

[PROPOSED] ORDER

This cause having come before the Court upon the duly noticed Motion to Withdraw by Pepper Hamilton LLP from representation of Bank Saderat PLC in this case, and upon consideration of the same and for good cause shown;

IT IS on this ____ day of ____, 2018,

ORDERED AND ADJUDGED that Pepper Hamilton LLP, by Jeremy D. Frey and William M. Taylor, shall be and is terminated as counsel of record for Bank Saderat PLC in this matter, and a copy of this Order shall be promptly provided to Bank Saderat PLC by Pepper Hamilton LLP and a certificate of service thereafter filed.

Hon. Roanne L. Mann
Chief Magistrate Judge

Notice to:

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Robert J. Tolchin
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